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September 9, 1994

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Ms. Jeanne Griffin
U.S. Environmental Protection Agency
Region 5
77 West Jackson Blvd. (HSM-5J)
Chicago, Illinois 60604

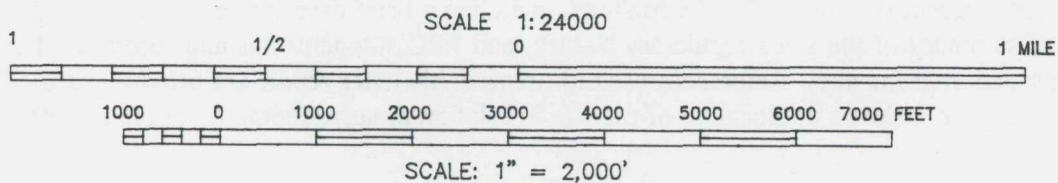
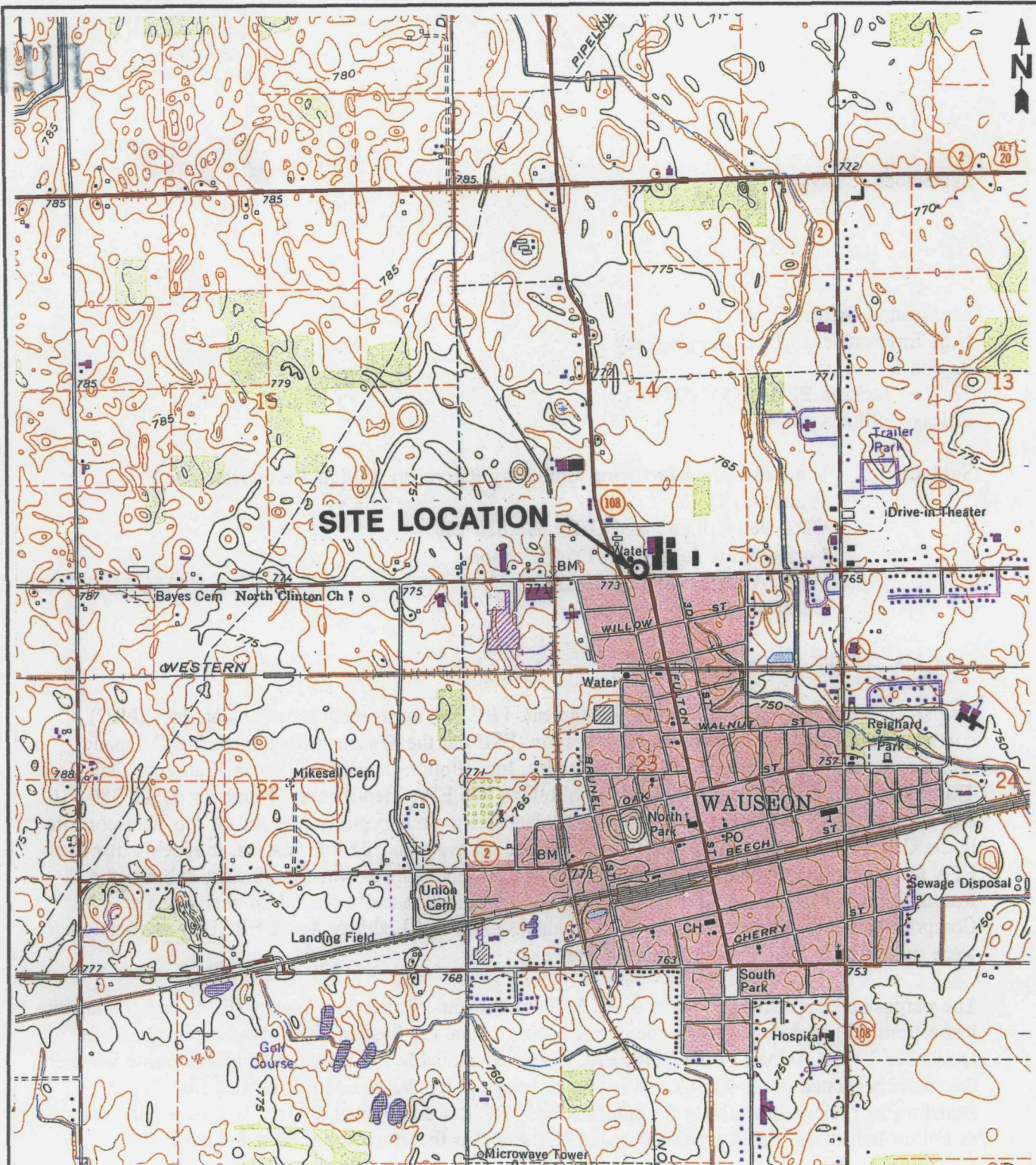
**Subject: Wauseon Manufacturing Company (currently Fulton Industries, Inc.)
Wauseon, Ohio
OHD 980 610 885 and OHD 094 810 736
Focused Site Inspection Prioritization
Work Assignment No. 35-5JZZ
Contract No. 68-W8-0084**

Dear Ms. Griffin:

As part of the above-referenced work assignment, PRC Environmental Management, Inc. (PRC), conducted a focused site inspection prioritization (FSIP) at the Wauseon Manufacturing Company (Wauseon), currently known as Fulton Industries, Inc. (Fulton Industries), site in Wauseon, Ohio. This site has apparently been assigned the following two EPA Identification Numbers: OHD 980 610 885 and OHD 094 810 736. These two EPA identification numbers are present for the Wauseon site in the CERCLIS database at EPA Region 5. Based on available file information, it appears that two EPA identification numbers were assigned to this site—one number when the facility submitted a Resource Conservation and Recovery Act (RCRA) notification and a second number when a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) notification were submitted to EPA for the Wauseon site.

The purpose of the FSIP is to assist the U.S. Environmental Protection Agency (EPA) in updating site inspections (SI) performed before the current Hazard Ranking System (HRS) was implemented in December 1990. As part of the FSIP, PRC reviewed available file information to determine whether the site is regulated under RCRA and is thus not eligible for the National Priorities List (NPL). Based on its review of available file information, PRC has determined that the Wauseon (also known as Fulton Industries) site is regulated under RCRA and is therefore not eligible for the NPL.

This letter report documents PRC's findings, including a brief description of the site and its location, a brief summary of the site's regulatory history, and PRC's conclusions and recommendations for further action at the site. References used to prepare this letter report are provided at the end of the letter. Figure 1 shows the location of the site in relation to surrounding topographic features.



WAUSEON MANUFACTURING COMPANY
WAUSEON, OHIO

FIGURE 1
SITE LOCATION

SOURCE: MODIFIED FROM USGS,
WAUSEON, OHIO, QUADRANGLE, 1971

PRC ENVIRONMENTAL MANAGEMENT, INC.

SITE LOCATION AND DESCRIPTION

The Wauseon (also known as Fulton Industries) site is located at 135 East Linfoot Street in Wauseon, Fulton County, Ohio (latitude 84°07'30"N; longitude 41°33'05"W) [Ohio Environmental Protection Agency (OEPA) 1985a]. The site occupies about 15 acres in a residential and industrial area (see Figure 1). The site contains of two main structures: a large manufacturing plant and a small wastewater treatment plant (PRC 1992).

Based on available information, the relationships between Fulton Manufacturing Corporation, Fulton Industries, Wauseon Manufacturing Company, Essex Group, Inc., and Chromalloy American Corporation are unclear. Fulton Manufacturing Corporation owned Wauseon and operated at the site from about 1940 to 1980. Between 1940 and about 1968, Wauseon manufactured plastic flashlights, boat lights, and lanterns. All product plating was contracted to outside facilities. In 1968, Fulton Manufacturing Corporation merged with Chromalloy American Corporation (Ecology and Environment 1990). At some time in the 1960s, a new electroplating and metal stamping process was implemented on site. During an unknown period of time in the 1960s and 1970s, Essex Group, Inc., manufactured sparkplugs on site. Further information on Essex Group, Inc., activities at the site was not available.

On May 17, 1979, Chromalloy American Corporation sold the site to Fulton Industries, the current owner. Fulton Industries presently manufactures battery-operated metal and plastic portable lighting devices such as flashlights, boat lights, lanterns, and float lights. Currently Fulton Industries electroplates these products on site. However, some products are electroplated off site at another facility (Ecology and Environment 1990). Wastewater from the electroplating division is treated in an on-site wastewater treatment plant before being discharged to the sanitary sewer. The wastewater treatment process produces a sludge that is currently stored in a roll-off box for less than 90 days before it is transported to Envirite in Canton, Ohio, for treatment and disposal (OEPA 1985b). This waste sludge contains copper, zinc, chromium, and nislulfate.

REGULATORY HISTORY

To date, the regulatory history at the site has included both RCRA and CERCLA activities. These activities are briefly summarized below.

RCRA Activity

In August, 1980, Fulton Industries submitted a Notification of Hazardous Waste Activity Form to EPA (Fulton Industries 1980a). Fulton Industries was assigned EPA Identification Number OHD 094 810 736. The notification identifies waste codes F006, P098, P104, P106 as being generated and treated, disposed, or stored on site. In October 1980, Fulton Industries submitted a Part A permit application to EPA that indicated the process code for waste pile storage (S03) (Fulton Industries 1980b). In November, 1980, Fulton Industries submitted a subsequent Part A permit application to EPA. The subsequent Part A Permit application indicated only the process code for tank treatment (T01) (Fulton Industries 1980c).

In the 1960s, Wauseon Manufacturing Company began electroplating and metal stamping on site. From the 1960s until 1980, the electroplating sludge was dewatered and transferred off site to the Fulton County Landfill. In 1980, the Fulton County Landfill closed. On September 29, 1980, OEPA conducted an inspection of the site and discovered that Fulton Industries had accumulated the electroplating waste in an outdoor waste pile for greater than 90 days (Ecology and Environment 1990). From 1980 to 1982, Fulton Industries had accumulated a 20-foot by 24-foot pile of wastewater treatment sludge (F006) that resulted from electroplating operations. In June 1982, Fulton Industries contracted Fondessy Enterprises to remove the waste pile and approximately a 10-inch layer of soil beneath the waste pile area. The waste pile and soil were disposed of at Fondessy Enterprises of Oregon, Ohio. Fondessy Enterprises continued to pick up the wastewater treatment sludge (F006) for disposal about every 80 days (Fulton Industries 1983).

From 1987 to the present, waste generated from the electroplating processes has been treated in an on-site wastewater treatment plant. The dewatered wastewater treatment sludge is transported to Heritage Environmental Company of Indianapolis. Wastewater is sand-filtered and pumped to the sanitary sewer system (Ecology and Environment 1990). Currently, Fulton Industries operates as a generator of hazardous waste (OEPA 1993).

An OEPA letter states that due to a "misunderstanding within OEPA," the facility was not required to undergo formal RCRA closure in 1982 when the waste pile was removed (OEPA 1985a). However, in 1985, OEPA requested that Fulton Industries undergo formal RCRA closure activities. OEPA requested that the former waste pile area be sampled and analyzed as a part of closure activities. On November 25, 1985, Bowser Morner, consultant to Fulton Industries, collected soil samples to determine the extent of contamination. Analyses showed the samples contained cyanide, cadmium, chromium, and nickel above background levels in the former waste pile area (Ecology and Environment 1990). On June 13, 1986, OEPA approved the closure plan that Fulton Industries submitted (OEPA 1986a). On July 25, 1986, EPA concurred with OEPA's approval of the closure plan (EPA 1986). On October 2, 1986, OEPA approved closure certification of the waste pile (OEPA 1986b).

On May 22, 1992, under the Technical Enforcement Support (TES) 9 contract with EPA, PRC conducted a Preliminary Assessment/Visual Site Inspection (PA/VSI) at Fulton Industries. The PA/VSI identified five solid waste management units (SWMU) and one area of concern (AOC).

CERCLA Activity

In June, 1981, Essex Group, Inc., of Dearborn, Michigan, filed a CERCLA 103(c) notification indicating that the Wauseon site was an uncontrolled hazardous waste facility (OEPA 1985a). The notification did not indicate the type of unit that the notification was filed for. The EPA identification number listed on the CERCLA 103(c) notification was OHD 980 610 885 for the Wauseon site (Essex Group, Inc. 1981). It is unclear from the site files why the Wauseon site was given this EPA identification number in addition to EPA Identification number OHD 094 810 736.

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On June 3, 1985, OEPA conducted a potential hazardous waste site preliminary assessment. OEPA assigned the site a low priority for further investigation (OEPA 1985a). In 1989, Ecology and Environment conducted a site screening inspection (SSI) at the site. Ecology and Environment collected eight soil samples near the former waste pile area. Analytical results showed aluminum, cadmium, chromium, copper, nickel, cyanide, and zinc to be above background levels (Ecology and Environment 1990).

CONCLUSIONS AND RECOMMENDATIONS

Based on the information discussed above, the Wauseon (also known as Fulton Industries) site is apparently regulated under RCRA and is therefore not eligible for the NPL. At this time, PRC recommends that the site be deferred to RCRA and that any future remedial action at the site be conducted under RCRA authority. The waste pile has undergone OEPA- and EPA- approved RCRA closure. However, as identified during the CERCLA SSI, contamination apparently still exists in the area of the former waste piles. This area of contamination, and any other areas of contamination, should be addressed as part of any future remedial activities at the site. These activities would be most appropriately conducted as required by the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or hazardous waste constituents from any SWMU, regardless of the time at which waste was placed in the unit.

REFERENCES

- Ecology and Environment, Inc. (Ecology and Environment). 1990. "Screening Site Inspection Report for Wauseon Manufacturing Company." August 3.
- Essex Group, Inc. 1981. "Comprehensive Environmental Response Compensation and Liability Act (CERCLA) 103(c) Notification of Hazardous Waste Site." June.
- Fulton Industries, Inc. (Fulton Industries). 1980a. "Notification of Hazardous Waste Activity." August 8.
- Fulton Industries. 1980b. "Part A Permit Application." October 15.
- Fulton Industries. 1980c. "Part A Permit Application." November 18.
- Fulton Industries. 1983. Letter Regarding Fulton Industries' Practices in 1983. To Jim Mayka, U.S. Environmental Protection Agency (EPA). From Richard Cheney, Fulton Industries. October 6.
- Ohio Environmental Protection Agency (OEPA). 1985a. "Potential Hazardous Waste Site Preliminary Assessment." June 3.
- OEPA. 1985b. Letter Regarding Status Report of Fulton Industries, Inc. From Tom E. Carlisle, Division of Solid and Hazardous Waste Management. To Daniel J. Banaszek, U.S. Environmental Protection Agency (EPA). July 17.

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OEPA. 1986a. Letter Regarding Ohio Environmental Protection Agency (OEPA) Approval of Fulton Industries, Inc. Closure Plan. From Warren W. Tyler, OEPA. To Richard Cheney, Fulton Industries, Inc. June 13.

OEPA. 1986b. Letter Regarding Approval of Fulton Industries, Inc., Waste Pile Closure. From Don Fisher, Division of Solid and Hazardous Waste Management. To Richard Cheney, Fulton Industries, Inc. October 2.

OEPA. 1993. Letter Regarding Removed Transporter Activity Status. To Ned Griggs, Fulton Industries. From Thomas E. Crepeau, Division of Hazardous Waste Management. May 10.

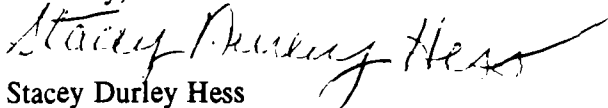
PRC Environmental Management, Inc. (PRC). 1992. "Preliminary Assessment/Visual Site Inspection of Fulton Industries, Inc." May 22.

U.S. Environmental Protection Agency (EPA). 1986. Letter Regarding Concurrence with OEPA Approval of Fulton Industries, Inc., Closure Plan. From Karl E. Bremer, Technical Programs Section. To Richard Cheney, Fulton Industries, Inc. July 25.

U.S. Geological Survey (USGS). 1971. 7.5-Minute Series. Topographic Map of Wauseon, Ohio, Quadrangle.

If you have any questions or comments regarding this letter report, please contact me at (312) 946-6458.

Sincerely,



Stacey Durley Hess
Site Manager

cc: Thomas Short - EPA Project Officer
Brigitte Manzke - EPA Contracting Officer
Christina Baker - OEPA Northwest District Office
Timothy Kileen - OEPA Northwest District Office
Majid Chaudhry - PRC ARCS Program Manager
Julie Kaiser - PRC Project Manager
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